

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

MARIA CAMILLA VALENCIA RIOS, <i>on behalf</i>)	
<i>of herself and all similarly situated individuals</i>)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:25-cv-474
)	
BELVEDERE NRDE, LLC, and PEGASUS)	
RESIDENTIAL, LLC,)	
)	
Defendants.)	

CONSENT MOTION FOR EXTENSION OF TIME

Defendant Belvedere NRDE, LLC (“Belvedere”), pursuant to Rule 6 of the Federal Rules of Civil Procedure, with the consent of the class Plaintiff, by her counsel, moves this Court for an extension of time for Belvedere to file responsive pleadings to Plaintiff’s Complaint (ECF No. 1) until August 6 for the reasons stated in the accompanying memorandum in support of this request.

Dated: July 17, 2025

Respectfully Submitted,

By /s/ Jeffrey P. Miller

Jeffrey P. Miller (VSB No. 89410)
GENTRY LOCKE
P. O. Box 780
Richmond, Virginia 23218
Telephone: (804) 956-2060
Facsimile: (540) 983-9400
miller@gentrylocke.com

Counsel for Belvedere NRDE, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2025, the foregoing was electronically filed with the Clerk of Court using the CM/ECF System, which will send a notification of such filing to all authorized users.

/s/ Jeffrey P. Miller

Counsel